



### REMARKS

The Office Action dated August 30, 2006, has been received and carefully noted. The above amendments to the claims, and the following remarks are submitted as a full and complete response thereto.

Claims 31, 35, 42, 45, 49 and 55 have been amended to more particularly point out and distinctly claim the subject matter of the invention. Claims 64-75 have been added. No new matter has been added, and no new issues are raised which require further consideration and/or search. Claims 31-33, 35-43, 45-56 and 58-75 are submitted for consideration.

As a preliminary matter, the Office Action indicated that claims 36, 39-40, 46, 52-54, 59 and 61-63 include allowable subject matter, and would be allowable if amended to be in independent form. Based on the arguments presented below, Applicant submits that all of the presently pending claims are allowable and requests reconsideration of the presently pending claims.

Claims 31-33, 35, 37-38, 41-43, 45, 47, 48-51, 55-56, 58 and 60 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,424,638 to Ray in view of U.S. Patent No. 6,882,844 to Keski-Heikkilä and U.S. Patent Publication No. 2002/0049073 to Bell. According to the Office Action, Ray teaches all of the elements of claims 31-33, 35, 37-38, 41-43, 45, 47, 48-51, 55-56, 58 and 60 except for teaching using a cell identity information structure of a second telecommunication network and wherein

the first telecommunications network is one of WLAN, Bluetooth or WCMDA and handovers for a dual-mode phone comprising a cellular transceiver and a short range transceiver. Thus, the Office Action combined the teachings of Ray, Keski-Heikkilä and Bell to yield all of the elements of claims 31-33, 35, 37-38, 41-43, 45, 47, 48-51, 55-56, 58 and 60. The rejection is traversed as being based on references that neither teach nor suggest the combination of features recited in each of claims 31, 42, 49 and 55, and the dependent claims thereon, in addition to claims 64-75.

Independent claim 31, upon which claim 32, 33, 36-41 and 64-66 depend, recites an apparatus for a first telecommunication network, the apparatus including a data store to store a cell identity information for a cell of the first telecommunication network using a cell identity information structure of a second telecommunication network. The apparatus is configured to allow the cell of the first telecommunication network to be identified as a neighboring cell by a cell of the second telecommunication network.

Independent claim 42, upon which claims 43, 45-48 and 67-69 depend, recites a handover module that is arranged to receive cell identities from cells of a first telecommunications network and a second telecommunication network. Cell identities of cells from both the first telecommunications network and second telecommunication networks use the structure of the second telecommunication network. The handover module is arranged to determine the need for changing serving cells and to initialize the process of changing a serving cell to another cell. The module is used for proving

seamless mobility between the first telecommunications network and the second telecommunication network.

Independent claim 49, upon which claims 50-54 and 70-72 depend, recites a method including storing in a first telecommunication network a cell identity information using a cell identity information structure of a second telecommunication network and transmitting the cell identity information to a mobile station. The method is used for seamless mobility between the first telecommunication network and the second telecommunication network.

Independent claim 55, upon which claims 56, 58-63 and 73-75 depend, recites a mobile station including means for communicating with a first telecommunication network and a second telecommunication network and means for receiving a cell identity information for a cell of the first telecommunication network using a cell identity information structure of the second telecommunication network.

Applicant submits that the cited references of Ray, Keski-Heikkilä and Bell do not teach or suggest the combination of elements in any of the presently pending claims.

Ray teaches a system and method for performing a handover of a call between different types of systems. When a serving mobile switching center (MSC) determines that there is not another MSC to which a handover can be performed, the serving MSC sends a message to an Internet Gatekeeper that maintains a database of all existing wireless systems within the area served by the Internet Gatekeeper. The Internet Gatekeeper chooses a target MSC of another wireless system, if possible, and transmits

the identity of this target MSC to the serving MSC. Thereafter, the serving MSC performs the handover to the target MSC by routing signaling messages to the target MSC. See at least the Abstract.

Keski-Heikkilä teaches a GSM mobile communication system that includes multiple base stations which are connected to a base station controller (BSC) which is in turn connected to a cell broadcast server. The cell broadcast server includes a supervision software that is used to create or assign an extra, permanent identity to each base station. The permanent identity assigned to each base station is included in the information signal that is transmitted by the base station to all mobile equipments located in its coverage area or region. The supervision software and base station controller are responsible for continuing to maintain or preserve the same identity for each base station, even after changes are made to the network. Keski-Heikkilä further teaches the GSM mobile communication system includes a terminal equipment that includes means for changing a subscriber profile on the basis of the identity of the particular base station that is currently serving that terminal equipment. The means receives information signal, including the permanent identity designation of the base station currently serving the terminal equipment. Changes in the subscriber profile are then made on the basis of the received or known permanent identity designation of the base station in whose communication coverage area the terminal equipment is currently located. Col. 3, line 11-Col. 4, line 12.

Bell discloses a wireless communications system with a wireless or mobile dual mode handset having a PCS or cellular mode for connection to a PCS/Cellular system and a cordless mode for connection to a cordless system. In the dual mode systems, communication is necessary between a cordless base station and a PCS/cellular network to facilitate hand-over of call between the two systems. See paragraphs 0006 and 0016.

Applicant submits that the combination of Ray, Keski-Heikkilä and Bell fails to teach or suggest the combination of elements in any of the presently pending claims. The Office Action acknowledged that Ray does not teach a data store to store a cell identity information for a cell of the first telecommunication network using a cell identity information structure of a second telecommunication network, as recited in independent claims 31, 42, 49 and 55. The Office Action alleged that the Ray teaches a need for protocol translation and data transfer between networks. However, the Office Action does not identify any section in Ray that teaches storing cell identity information, not to mention, the format in which such information is stored.

The Office Action also alleged that Keski-Heikkilä teaches a cell ID which can be modified. Applicant agrees that Keski-Heikkilä teaches a cell ID which can be modified, but fails to see how this teaching of Keski-Heikkilä is relevant. Keski-Heikkilä merely discloses a single network solution without any indication of handover, much less, handover between to different network types. Keski-Heikkilä merely teaches that a cell ID in a signal network solution can be either permanent or modified.

The Office Action alleged that it would have been obvious for a man skilled in the art to combine the cell ID from the Keski-Heikkilä with the teachings of Ray. However, the Office Action has provided no reason why one skilled in the art would combine these two references. More importantly, even if one skilled in the art were to combine the teachings of Keski-Heikkilä and Ray, the result would not yield the combination of features recited in the presently pending claims. The combination of Keski-Heikkilä and Ray would only teach or suggest how to use cell IDs in a GSM system. The combination does not bring any light on how the cell identity structure of a second network (e.g. GSM) is used by a first network (e.g. WLAN) in identifying the cells of the first network as a neighboring cells to the second network, as recited in the presently pending claims.

Even if as the Office Action alleged, Ray recognized a need for protocol translation, Applicant submits that Ray teaches away from the presently pending claims. Applicant submits that if a protocol translation, as taught in Ray, is needed between two networks, that suggests that one would also need a protocol translation for the cell ID. Thus, the combination of Keski-Heikkilä and Ray would yield a solution where the cell ID are different in different networks and the Internet Gatekeeper is used to translate the cell ID from one format to another. This is totally opposite from the combination recited in the presently pending claims, where the first and second networks use same cell ID structure.

Furthermore, Applicant submits that the Office Action seemed to be confused with the first and second network recited in the presently pending claims. The Office Action

indicated that the GSM network of Ray is "the first network" when referring to HLR and VLR as the data stores (which in the presently pending claims clearly are in the first network). Therefore, in accordance with the presently pending claims, the cell of the GSM network should be identified using the cell identity structure of IP network. However, no such teaching or suggestion is presented in Ray. Later, the Office Action also seemed to use the GSM network as the second network and the IP network as the first network. If that is the case, the HLR and VLR can not be the data storages, as was previously indicated in the Office Action, as the data storages would need to be in IP network. In addition, in the GSM system, HLR and VLR are not used to store cell identifiers (VLR and HLR store the subscriber data, not information about individual cell, RNC is the elements in GSM for handling the cell IDs).

Bell does not cure any of the deficiencies of Keski-Heikkilä and Ray as outlined above. Bell merely discloses Bluetooth, but is pretty much irrelevant to the presently pending claims as it is totally silent about the cell ID structure and how two networks use same cell ID structure. Therefore, Applicant respectfully asserts that the rejection under 35 U.S.C. §103(a) should be withdrawn because neither Keski-Heikkilä, Ray nor Bell, whether taken singly or combined, teaches or suggests each feature of claims 31, 42, 49 and 55 and hence, dependent claims 32, 33, 36-41, 43, 45-48, 50-54, 56 and 58-75 thereon.

As noted previously, claims 31-33, 35-43, 45-56 and 58-75 recite subject matter which is neither disclosed nor suggested in the prior art references cited in the Office

Action. It is therefore respectfully requested that all of claims 31-33, 35-43, 45-56 and 58-75 be allowed and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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Enclosures: Additional Claim Fee Transmittal  
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